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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

UNITED STATES *ex rel.* FOOTHILLS  
ENERGY SERVICES, INC., a Colorado  
corporation,

Plaintiff,

v.

PHILADELPHIA INDEMNITY  
INSURANCE COMPANY, a Pennsylvania  
corporation; SAYERS CONSTRUCTION,  
LLC, a Texas limited liability company;

Defendants.

CASE NO. 2:19-cv-2016-KJD-DJA

**STIPULATED MOTION FOR  
EXTENSION OF TIME TO FILE  
PROPOSED TRIAL MANAGEMENT  
ORDER (First Request)**

Plaintiff, Foothills Energy Services, Inc. (“Foothills”), and Defendants, Philadelphia Indemnity Insurance Company (“Philadelphia”) and Sayers Construction, LLC (“Sayers”) (collectively, “the parties”), by and through their attorneys, respectfully move this Court to enter

an order granting an extension of time to file a proposed Trial Management Order until July 15, 2022 for the parties to complete mediation. Pursuant to Local Rules IA 6-1 and IA 26-3, Foothills states as follows:

1. Trial is not set in this matter.
2. The deadline for filing a proposed trial management order is April 25, 2022.
3. Although they have not confirmed a specific date, the parties have agreed to participate in mediation in June 2022 in hopes of resolving their dispute.
4. Accordingly, the parties request that the deadline to file a proposed Trial Management Order be extended until July 15, 2022.
5. No previous extensions related to the subject deadline have been requested and permitting the opportunity for mediation constitutes good cause because it will permit the parties to continue on-going efforts to resolve the matter.

WHEREFORE, Foothills, Philadelphia and Sayers respectfully request that the Court enter an order extending the deadline for filing the proposed Trial Management Order from April 25, 2022 to July 15, 2022.

DATED: April 21, 2022.

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**ORDER**

IT IS SO ORDERED. Joint Pretrial Order due July 15, 2022.

DATED: April 28, 2022



DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

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